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16 GARRETT & DUNNER, L.L.P.
17 901 New York Avenue, NW
18 Washington, DC 20001-4413
19 Telephone: (202) 408-4000
20 Facsimile: (202) 408-4400

21 Attorneys for Defendant
22 CHINA & ASIA TRAVEL SERVICE, INC.,
23 D/B/A CHINA INTERNATIONAL TRAVEL
24 SERVICE (USA)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29 CHINA INTL TRAVEL SERVICES (USA),
30 INC.,

31 Plaintiff,

32 v.

33 CHINA & ASIA TRAVEL SERVICE, INC.,
34 D/B/A CHINA INTERNATIONAL TRAVEL
35 SERVICE (USA), and DOES 1-10, inclusive,

36 Defendants.

CASE NO. 08-cv-01293 (MEJ)

**DECLARATION OF FRANK LI IN
SUPPORT OF DEFENDANT'S
MOTION TO DISMISS OR, IN THE
ALTERNATIVE, FOR SUMMARY
JUDGMENT ON ALL COUNTS OF
PLAINTIFF'S COMPLAINT**

1

2 I, FRANK LI, declare as follows:

3 1. I am a resident and citizen of the state of California;
4 2. I am the President of Defendant China & Asia Travel Service, Inc., d/b/a China
5 International Travel Service (USA)'s ("Defendant"). I have been employed by Defendant for 16
6 years. I make this Declaration in support of Defendant's Motion to Dismiss or, In the Alternative,
7 for Summary Judgment. I have personal knowledge of the facts stated therein and if called as a
8 witness, could and would competently testify thereto.

9
10 3. Defendant began doing business as "China International Travel Service Headquarters
11 (USA)" in 1992. In 1997 this usage changed simply to "China International Travel Service (USA)".
12 Defendant has used the CITS USA name consistently since at least as early as 1997. Attached
13 hereto as Exhibit A is a true and correct copy of Defendant's California fictitious name registration
14 for the name "China International Travel Service Headquarters (USA)", dated August 5, 1992.
15 Attached hereto as Exhibit B is a true and correct copy of Defendant's California fictitious name
16 registration for the name "China International Travel Service (USA)", dated July 18, 1997, renewed
17 on May 16, 2002 and March 23, 2007 respectively.

18
19 4. Defendant has used the CITS GLOBE DESIGN on its letterhead continuously since
20 1992. Attached hereto as Exhibit C is a true and correct copy of a letter dated March 20, 1992, from
21 Jianhua Zhang, Defendant's then-President, to the Airline Reporting Corporation.

22
23 5. Attached hereto as Exhibit D is a true and correct copy of a cease-and-desist letter
24 sent by Defendant to Grand Pacific Tours Int'l Co. dated June 5, 1992 and a response from Grand
25 Pacific to Defendant dated June 15, 1992.

26
27 6. Attached hereto as Exhibit E is a true and correct copy of a letter dated May 17, 1993,
from Jianhua Zhang, Defendant's then-President, to the Airline Reporting Corporation.

1 7. Attached hereto as Exhibit F is a true and correct copy of an advertisement Defendant
2 placed in the New York Times in 1993.

3 8. Defendant has been a member of the Airline Reporting Corporation since 1993.
4 Attached hereto as Exhibit G is a true and correct copy of a letter from ARC dated July 22, 1993,
5 reflecting Defendant's membership in that organization.

6 9. Defendant has been a member of the International Airlines Travel Agent Network
7 since 1994. Attached hereto as Exhibit H is a true and correct copy of a letter from IATAN dated
8 May 13, 1994, reflecting Defendant's membership in that organization.

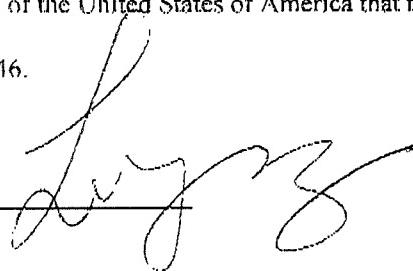
9 10. Defendant has been a member of the United States Tour Operators Association since
10 1999. Attached hereto as Exhibit I is a true and correct copy of a letter from USTOA dated January
11 18, 1999, reflecting Defendant's membership in that organization.

12 11. Defendant has been a preferred visa services provider for The Consulate General of
13 The People's Republic of China in Los Angeles since 1993. Attached hereto as Exhibit J is a true
14 and correct copy a letter from The Consulate General of The People's Republic of China in Los
15 Angeles dated May 1, 1993 reflecting that status.

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct pursuant to 28 U.S.C. § 1746.

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23 Dated: March 31, 2008
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Frank Li



China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT A

SEE REVERSE FOR INSTRUCTIONS

PLEASE PRINT OR TYPE

A. MAIL FILED DOCUMENTS TO:					
RICHARD K. QUAN, ESQ.					
NAME	1100 Wilshire Blvd., Ste. 2800				
ADDRESS					
CITY	L.A.	STATE	CA	ZIP	90017
PHONE	213/481-2888				
<input checked="" type="checkbox"/> First Filing	<input type="checkbox"/> Renewal Filing				
Current Registration No. _____					

**B. PUBLISH IN
NEWSPAPER:**

COUNTY CLERK'S FILING STAMP

FILED

LOS ANGELES COUNTY CLERK

AUG 05 1992

CHARLES WIGGINS, COUNTY CLERK

H. M. M.

BY G. MORALES, DEPUTY

FICTITIOUS BUSINESS NAME(S)

THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS:

CHINA INTERNATIONAL TRAVEL SERVICE HEADQUARTERS (U.S.)**1.**

Fictitious Business Name(s)

CHINA INTERNATIONAL TRAVEL SERVICE HEADQUARTERS (U.S.)

Zip Code

2.

Street Address, City & State of Principal Place of Business in California

975 East Green Street, Suite 101, Pasadena, CA 91106

Zip Code

3.

Full name of Registrant (If corporation - show state of incorporation)

CHINA & ASIA TRAVEL SERVICE, INC. - CALIFORNIA

Zip Code

Residence Address

City

State

Zip Code

975 East Green Street, Suite 101, Pasadena, CA 91106

Full name of Registrant (If corporation - show state of incorporation)

Residence Address

City

State

Full name of Registrant (If corporation - show state of incorporation)

Residence Address

City

State

4.

This business is conducted by:

 an individual a general partnership joint venture a business trust co-partners husband and wife a corporation a limited partnership an unincorporated association other than a partnership other-please specify**5.** Do not leave blank

The registrant commenced to transact business under the fictitious name or names listed above on 8/15/92

6A.

Signed _____

Signed _____

Type or Print Name(s)

6B.

If Registrant is a corporation sign below:

Corporation Name CHINA & ASIA TRAVEL SERVICE, INC.

Signature & Title Zhang, Jianhua, President

Type or Print JIANHUA ZHANG, President

Officer's Name & Title

7.

This statement was filed with the County Clerk of _____

County on (date indicated by file stamp above.)

I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY
OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE

CHARLES WIGGINS

COUNTY CLERK

DEPUTY

32163373

BY _____

FILE NO.

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China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT B

RECEIVED - MAY 6 2008

A

Printed 4/19/2008 CJK

REGISTRAR-RECORDER/COUNTY CLERK'S FILING STAMP

02 1131012

File #971087388 expires 7/18/02 or 40 days after business changes.

CHINA INTERNATIONAL TRAVEL SERVICE (USA)
 C/o (China And Asia Travel Service Inc - Feng Li
 975 E GREEN ST STE 101
 PASADENA CA 91106-2415
 (Unclaimed/Abandoned/Dead/Defunct/Null/Nullified)

1 First filing Renewal filing

FICTITIOUS BUSINESS NAME STATEMENT

THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS: (Attach additional pages if required)

Fictitious Business Name(s)

1. CHINA INTERNATIONAL TRAVEL SERVICE (USA)
 2.

3.

Articles of Incorporation or Organization Number (if applicable)
 AI #/ON 1493464

Street Address & City of Principal Place of Business in California (P.O. Box alone not acceptable)

3 975 E GREEN ST STE 101

PASADENA

CA 91106-2415

Full name of Registrant

CHINA AND ASIA TRAVEL SERVICE INC

(if corporation - incorporated in what state)

CA

Residence Street Address

975 E GREEN STREET SUITE 101

PASADENA

CA 91106

Full name of Registrant

Residence Street Address

Full name of Registrant

Residence Street Address

5 This Business is an individual a general partnership
 conducted by: co-partners husband and wife
 (check one only) an unincorporated association other than a partnership

joint venture a business trust
 a corporation a limited partnership
 a limited liability company

6 The registrant commenced to transact business under the fictitious business name or names listed on (Date): 7/18/97
 Registrant has not yet begun to transact business under the fictitious business name or names listed herein.

7 I declare that all information in this statement is true and correct.
 (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)

8 Signature of Registrant(s)

SIGNATURE TYPE OR PRINT NAME

SIGNATURE TYPE OR PRINT NAME

SIGNATURE TYPE OR PRINT NAME

8A If Registrant IS A CORPORATION or LLC, sign below:

CHINA AND ASIA TRAVEL SERVICE INC

X Corporation or LLC Name

X Signature

President

Title

FENG LI Type or Print Name

This statement was filed with the County Clerk of LOS ANGELES county on date indicated by file stamp above.
 NOTICE - THIS FICTITIOUS NAME STATEMENT EXPIRES FIVE YEARS FROM DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE. The filing of this statement does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state or common law (See Section 14400 et seq., Business and Professions Code)

LEGAL DESK™ - Fictitious Business Name Statements - AAD News
 Adjudicated in LA County Superior Court #NOC 9391 joycom@pacbell.net
 3413 Soledad Cyn Rd - PO Box 87, Acton, California 93510-0057 (661) 269-1169
 County Business Names on file 1 800 605 7171 (Average call 3 min. cost per \$1.00 min. \$2.)

Filing/Publishing Fee: \$10, for 1 FBN and 2 registrants
 plus \$2.00 for each additional FBN/registrant to
 LA County Clerk & S47 Legal Desk - AAD News
 • CHANGES SEE BACK •

THIS FORM SHOULD BE TYPED OR
 PRINTED "LEGIBLY" IN BLACK INK.

MAILING ADDRESS:	3/15/2007 ck# 6474
Name	CHINA INTERNATIONAL TRAVEL SERVICE (USA)
Address	975 E GREEN ST STE 101
City/State/Zip	PASADENA CA 91106-2415
	1

(New file number below is good for five years from new filed date)

NEWFILDA
TE 3/23/2007

NEWFILNUM

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Principal Business Name(s)	-1 CHINA INTERNATIONAL TRAVEL SERVICE (USA)
	2

3

(Street address of principle place of business in California)		
975 E GREEN ST STE 101	CD65	
PASADENA	CA	91106-2415
1		



0072	Dear Client:
------	--------------

Here is your personal copy of your Fictitious Business Name Statement (DBA-Doing Business Under An Assumed Name) **RENEWAL FILING**.

We have re-filed your Fictitious Business Name Statement with the LOS ANGELES REGISTRAR-RECORDER/COUNTY CLERK, as you requested us to do.

This filing is good for five years from the filing date- IF YOU DONT CHANGE ANYTHING. After five years you must renew your Fictitious Business Name Statement if you plan to continue doing business using the same name within Los Angeles County. If you make any changes to ownership or address, during the next five years, you must refile and publish again within 45 days or your statement automatically expires.

At the beginning of 1993, the Los Angeles Registrar-Recorder/County Clerk began to file Fictitious Business Name Statements on microfilm. This means that within about 75 days the Clerk will return your original document to you after it has been recorded on microfilm. Put your original in a safe place. Your Fictitious Business Name Statement is now in the public record, on microfilm, at the Los Angeles Registrar-Recorder/County Clerk's office.

If you wish to abandon your business name you must file a Statement of Abandonment with the Los Angeles Registrar-Recorder County Clerk. We can do that for you too if you need it.

Thank you for choosing our newspaper to publish this legal information for you. We wish you five years of continued success in your business.

Please call us again if we can help you in the future.

LEGAL DESK - Acton Agua Dulce News

PS - Look up new or old business names to check refile status or before you file to avoid legal problems with business names already used - Call 1 800 505 7171.

--Live Operator. Computer search/lookup average call \$7, (\$6 first min. +\$2 each extra in.)

THIS STATEMENT WAS FILED WITH THE COUNTY CLERK OF LOS ANGELES COUNTY ON DATE INDICATED BY FILE STAMP TOP RIGHT.

NOTICE: THIS FICTITIOUS NAME STATEMENT EXPIRES **3/23/2007** FROM THE DATE IT WAS FILED AS SHOWN ABOVE IN #6 OF TOP RIGHT. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE. THE FILING OF THIS STATEMENT DOES NOT OUNTELL AUTHORIZED USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 1440 ET SEQ. BUSINESS AND PROFESSIONS CODE). 4:49:31 PM 3/29/2008

Legal Desk - Fictitious Business Name Statements
NAME SEARCH/Answer Phone 1-800-505-7171
(Adjudicated in LA COUNTY Superior Court #NOG 9501)
3413 Santiago Rd. • Bureau Unit #21 • G.Y.M.
ACTON/AQUA DULCE NEWS (661-259-1189)
PO Box 57 • ACTON, CA 93510-0057

*CALL 1 800 505 7171. LOOK UP BUSINESS NAMES BEFORE YOU FILE. AVOID LEGAL PROBLEMS WITH NAMES IN USE.

Lost your file number? Forget your expire date? - (\$6 first min. + extra min \$2)
Live operator available • 7 names per call • COMPUTER SEARCH /LOOK UP

Notice prepared on 3/29/2007



China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT C



CHINA & ASIA TRAVEL SERVICE, INC.
A Subsidiary of China International Travel Service Headquarters

March 20, 1992

ARC
New Applications Department
1709 New York Avenue, NW
Washington D.C. 20006

Dear Sirs:

China & Asia Travel Service, Inc. is the subsidiary of China International Travel Service Headquarters(CITS) which is the largest state-owned tourist company founded in 1954 in China. My Company is legally registered in the state of California and has been doing business for the last two years in the city of Pasadena, California. We sell tour products to China, Japan, Thailand and other south-eastern Asia countries. We also do visa handling for those tourists to the abovementioned countries. We intend to join ARC as we would like to expand our business by selling air tickets for various airlines. I would greatly appreciate your sending me the information material on membership qualification and application form etc.. Please do not hesitate to contact me if you need more information on my Company. The mailing address and phone, fax numbers are as follows:

China & Asia Travel Service, Inc.
975 E. Green Street, Suite 101
Pasadena, CA. 91106

phone: 818-568-8993
fax : 818-568-9207

I am looking forward to hearing from you.

Respectfully yours,

Zhang Jianhua
Jianhua Zhang

President, China & Asia Travel Service, Inc.

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT D

CITS USA

626 668 9207

FAX NO. 213 848 6666

Filed 03/31/2008

10/19/07 11:58am P. 009

JUN 25 '92 16:49 QUAN, COHEN ET AL

P.2

QUAN, COHEN, KURAHASHI, HSIEM & SCHOLTZ
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

RICHARD K. QUAN
KENNETH P. SCHOLTZ
ARTHUR D. COHEN
BILSEEN KURAHASHI
RICHARD W. HSIEH
RICHARD S. YANG
RONALD H. HIRANO
GLAINE H. FONG

1100 WILSHIRE BOULEVARD, SUITE 2900
LOS ANGELES, CALIFORNIA 90017-1916

TELEPHONE (213) 461-2884

FACSIMILE (213) 461-2882
OF COUNSEL
MARION C. PAY

June 5, 1992

IN REPLY REFER TO:

No. 9887

Grand Pacific Tours Int'l Co.
3030 Gainsborough Drive
Pasadena, California 91107

Re: Unlawful Use of Name and Logo

Dear Sir or Madam:

This office represents China International Travel Service ("CITS"), a corporation organized and existing under the laws of the Peoples Republic of China and China National Tourism Administration, a California corporation.

It has recently been brought to our clients' attention that you are using the logo and name of CITS in connection with your business without the authorization of China International Travel Service. You have also unlawfully incorporated a significant part of the logo of China National Tourism Administration into your logo.

Our clients inform us that you have not been authorized to hold yourself out as having any affiliation whatsoever with either the China International Travel Service or the China National Tourism Administration.

On behalf of our clients we demand that you immediately cease and desist from:

1. Representing that you are the CITS overseas office;
2. Using the CITS logo in connection with your business, stationery or other materials;
3. Incorporating and using the China International Tourism Administration logo in connection with your business, stationery or other materials;

CITS USA

628 588 9207

10/19/07 11:28AM P. 004

JUN 05 '92 16:49 QUAN, COHEN ET AL

P.3

Grand Pacific Tours Int'l, Co.
June 5, 1992
Page 2

4. Holding yourself out to the public as being affiliated with either the China International Travel Service or the China National Tourism Administration.

Unless you immediately halt your unlawful practices, we have been instructed to initial legal action to enjoin your unlawful conduct and seek damages against you as permitted under the laws of the State of California and the United States.

You are advised to act accordingly.

Very truly yours

QUAN, COHEN, KURAHASHI, HSIEH
& SCHOLTZ
A Professional Corporation

RICHARD K. QUAN

RKQ/cn

cc: China International Travel Service
China National Tourism Administration

CITS USA

626 668 9207

FAX NO. 650 840 6666

Filed 03/31/2008 Page 4 of 4 P. 08/13

10/18/07 11:08am P. 008

Grand Pacific International Co.

Jun 15, 1992

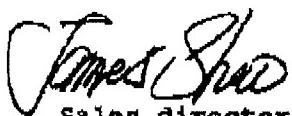
QUAN, COHEN, KURAHASHI, HSIEN & SCHOLTZ
PROFESSIONAL CORPORATION
ATTORNEY AT LAW
1100 WILSHIRE BOULEVARD, SUITE 2900
LOS ANGELES, CALIFORNIA 90017-1916
MR. RICHARD K. QUAN

Dear Mr. Quan

Regarding your letter of Unlawful Use of Name and Logo, we ceased to use the Name and Logo of C.I.T.S and C.N.T.A. starting from Jun 15, 1992. The new stationary with the correction will be sent to you in two weeks as proof , if you have any questions, please do not hesitate to contact me at (818) 585-1888 or Fax (818) 793-9546.

Sincerely yours

james shao


Sales Director
JS/gz

3030 Gainsborough Dr. Pasadena, CA 91107, U. S. A. Tel:(818)585-1888 Fax:(818)793-9546

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
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EXHIBIT E



CHINA & ASIA TRAVEL SERVICE, INC.
A Subsidiary of China International Travel Service Headquarters

May 17, 1993

Agency Accreditation Service
Airlines Reporting Corporation
1709 New York Avenue, N.W.
Washington, D.C. 20006-5288

Dear Sir or Madam,

We are submitting all the documents to you for your approval as a member of Airline Reporting Corporation. Enclosed please kindly find the following attachments:

01. The original letter of ARC with control # 048692;
02. The original and one copy of this application;
03. The original and one copy of personal History Form for Mr Zhang and Ms Wei;
04. The current financial statement of China & Asia Travel Service Inc.;
05. Both copies of the Memorandum of Agreement to the Airlines Reporting Corporation Agent Reporting Agreement;
06. Four mailing labels;
07. A voided check;
08. A copy of the receipt for the rental of the safe deposit box in the Far East National Bank;
09. A copy of the certificate of incorporation;
10. A copy of the Federal Taxpayer (IRS) Identification Number confirmation;
11. The irrevocable letter of credit in the full legal name of ~~China & Asia Travel Service, Inc.~~;
12. Interior and exterior photographs of office location;
13. The diskette copy of application;
14. The copy of business license of city of Pasadena;

If you find any document insufficient, please contact me at 818 568 8993. Looking forward to hearing from you.

Thank you for your assistance.

With best regards,

Jianhua Zhang
President of China & Asia Travel Service, Inc.

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
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EXHIBIT F

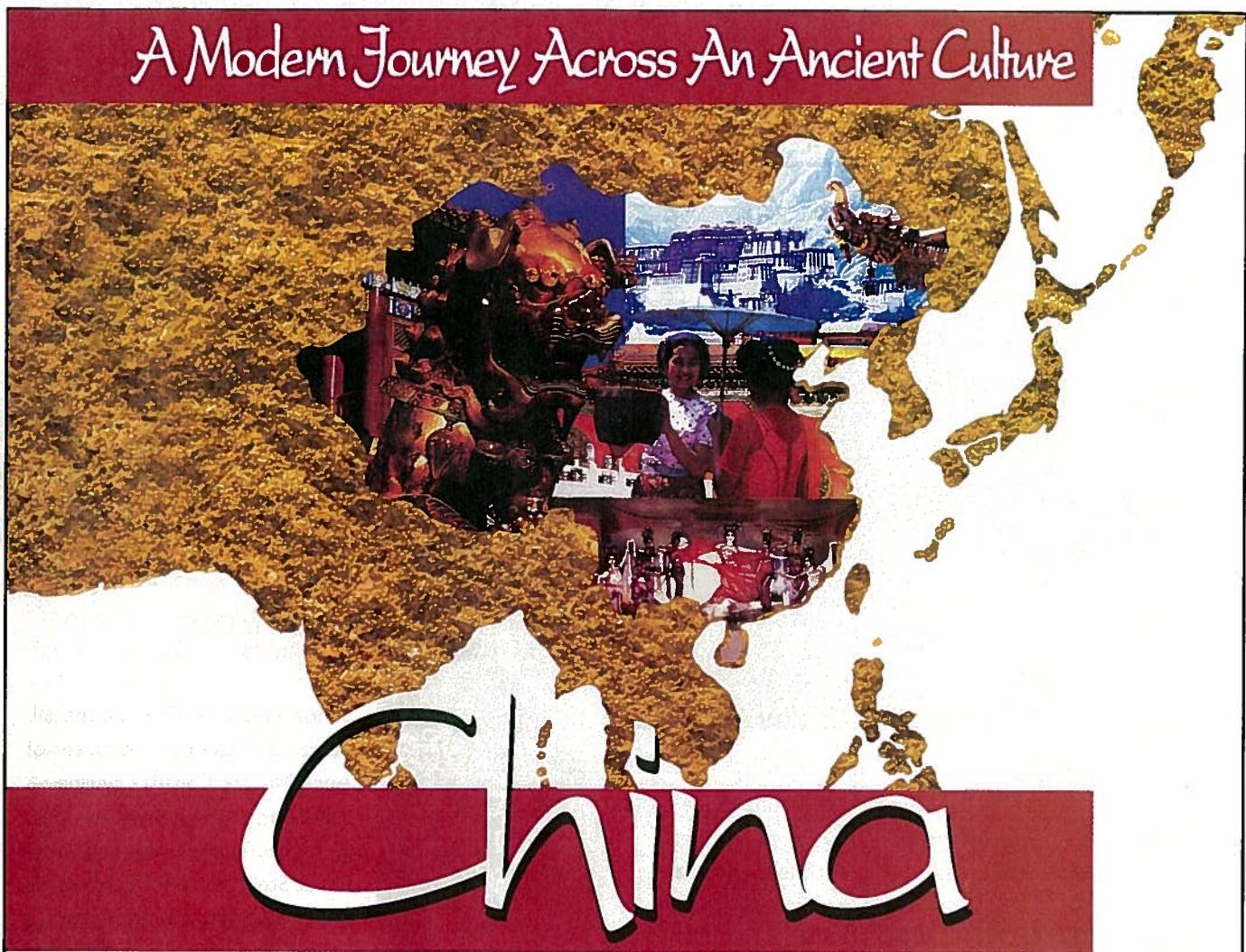
OCTOBER 31, 1993



GLOBAL TRAVELER

A PACKAGE AND VACATION GUIDE





China's national host to the world

CITS (China International Travel Service), the largest and the most reliable Chinese travel organization, has rapidly brought China travel into the 21st century... creating an infrastructure of five-star hotels, modern transport and efficient communications... everything to satisfy a traveler's need for comfort and thirst for adventure.

Enter the forbidden city

China stands ready to be revealed.

Come see it – the wonders – manmade and natural, the glory, the diversity. Beijing. Shanghai. Chengde. The Yangtze River. The Great Wall. The Terra-Cotta Warriors. The list is endless. The time to see them is now.

A friendly people

Meet China's people. Sense the energy, the tenacious grasp of the practical, their soaring spirit. But the warmth and enormous

hospitality of its people will make the deepest impression.

See it in luxury fit for emperors

The legendary splendor of Imperial China is testimony to the Chinese ability to create luxury. The Emperors are gone, but the traditions of incredible comfort in accommodation, exquisite cuisine and utterly meticulous service remain. Let us pamper you, as we carefully guide you through our world of wonders.

China International Travel Service, Head Office • 103 Fuxingmennei Avenue, Beijing 100800, China (PRC) • Tel: (01) 6012022 • Fax: (01) 6012021
China International Travel Service, U.S.A. • 975 East Green Street, Suite 101, Pasadena, Calif 91106 • Tel: 818 568 8993 • Fax: 818 568 9207

Call a USTOA tour operator for an assured journey to China!

Abercrombie & Kent
800 • 323-7308

African Travel Inc.
800 • 421-8907

American Express
800 • 241-1700

Brendan Tours
800 • 421-8446

Certified Tours, Inc.
800 • 233-7260

Collette Travel Services, Inc.
800 • 832-4656

Der Tours, Inc.
800 • 782-2424

Globus & Cosmos Tourama
800 • 221-0090

Holland American Line-Westours, Inc. Jet Vacations, Inc.
800 • 426-0327

Isram World
800 • 223-7460

Japan & Orient Tours
800 • 377-1080

800 • 538-0999

Jetset Tours, North America, Inc. Special Expeditions, Inc.
WorldLink: 800 • 4 - JETSET 800 • 762-0003

Pacific Bestours, Inc.
800 • 688-3288

TBI Tours
800 • 223-0266

Pacific Delight Tours, Inc.
800 • 221-7179

Visitours, Inc.
800 • 367-4368

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT G



Airlines Reporting Corporation

July 22, 1993

CHINA & ASIA TRAVEL SERVICE INC
DBA CHINA INTL TVL SVC USA
SUITE 101
975 E GREEN ST
PASADENA CA 91106

ATTENTION: OWNER OR MANAGER

RE: APPROVAL OF NEW AGENT

Dear Travel Agent:

I am pleased to inform you that your agency has been included on the Airlines Reporting Corporation (ARC) Agency List effective the above date. Your ARC agency code number is:

05-70997-0

Please refer to this complete number in all future correspondence to ARC. Your agency should begin reporting to Area Bank/Processing Center 6 - PYW-PHOENIX , with the sales report period ending August 1, 1993. The proceeds from sales in which ARC traffic documents are issued, minus your commissions, are the property of the carriers and are held in trust by you. ARC's first draft will be presented to your bank on August 11, 1993. Even though you may not yet have received ARC traffic documents by the time your first sales report is due, you must submit a sales report settlement authorization form and mark the "No Sales" block.

An initial supply of ARC traffic documents has been ordered, and you should receive them within approximately the next two weeks. Should you receive them prior to the Monday of your first sales period, please do not use them until that Monday. Please allow adequate time for your shipment to be processed. If a delay greater than two weeks from the date of this letter occurs, call Rand McNally, NOT ARC, at (708) 673-8660 for assistance.

Please note, ALL ATB orders must be authorized by your servicing CRS before they will be filled. Please remember also that ARC traffic documents may only be issued in the agency code number for which they are assigned. Under no circumstances may one branch's tickets be issued and identified by the home office, another branch or an STP location's agency code number, or vice versa, even if the supplies assigned to one are depleted.

ARC traffic documents are extremely valuable and are supplied to you in trust. In the event of a change in ownership, possession and use of ARC traffic documents and carrier identification plates by the new owner(s) prior to ARC approval is prohibited. Attachment B in Section 80 of the Handbook contains the security rules for these documents and also for the airline identification plates that the carriers supply to you.

Owners and qualifiers should familiarize themselves with the Industry Agents' Handbook, particularly Section 80 (ARC Agent Reporting Agreement) which sets forth the rights and obligations of an ARC approved agent. Other very useful information and instructions may be found in Section 3.6 (ticket reordering

forms and procedures), Section 3.8 (ticket imprinter ordering procedures), Section 12 (preparation of sales reports and area bank/processing center addresses), Section 20 (the ARC travel agent training program), Section 30 (bond/letter of credit forms and procedures), Section 60 (applications and procedures for any changes in status of an approved agent), and Section 70.2 (tips regarding security and storage ARC traffic documents).

Please note, some carriers maintain supplemental appointment standards and processing fees and the carriers that wish to appoint your agency location will provide you with carrier validation plates directly.

The provision of free or reduced-rate transportation by a carrier to any agent and its employees is governed by whatever terms, rules and/or regulations that the carrier establishes. Eligibility requirements are determined solely by the carriers, NOT BY ARC, and all questions regarding the requirements should be directed to the individual carriers. Please refer to Section 200 of the Handbook for additional information.

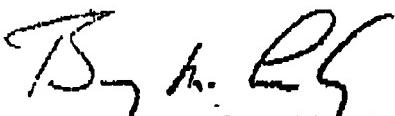
Likewise, the commission and any other compensation paid to agents by carriers depend on what each carrier and each agent agree upon privately and directly between themselves. ARC has no role in determining the amount or nature of such compensation and will not involve itself in that process or in any dispute about it.

Enclosed is your copy of the executed Memorandum of Agreement indicating the effective date of your agency's inclusion on the ARC Agency List. The text of the Agent Reporting Agreement is in Section 80 of the Handbook. This agreement may not be assigned or transferred by the agent without the approval of ARC. Also enclosed is a counter sign which must be displayed continuously in a conspicuous place at each travel agency location.

And last, we provide your agency name, address and agency code number not only to carrier participants, but to other organizations, some of which may use it for marketing purposes. If you prefer not to have your name released for such purposes, please advise ARC in writing promptly, and direct it to the attention of Data Services, (703) 816-8085.

If further assistance is needed, please refer to Section 1.2 of your Industry Agents' Handbook for the telephone number of the appropriate department.

Sincerely,



Barry M. Lemley, Director
Agency Accreditation Services

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

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EXHIBIT H



May 13, 1994

FENG LI
 CHINA & ASIA TRAVEL SERVICE INC.
 CHINA INTERNATIONAL TRAVELSERVICE HEADQUARTERS (U.S.A.)
 975 EAST GREEN STREET
 SUITE 101
 PASADENA, CA 91106

IATA Code Number: 05-7 0997 0

TCIN Number: LHF57052101

Dear Travel Agent:

We acknowledge receipt of your application or renewal order for the IATAN Travel Agent ID Card.

Due to the unprecedeted demand for the card, your ID Card will reach you within 3 to 4 weeks from the date of this letter. In the meantime, to facilitate your ability to use your industry privileges, please present this letter in its original form, along with a current copy of your 1994 IATAN Agency Personnel Listing.

Your card is the key to your recognition in the industry. Show it with pride each time you travel. Welcome to the program.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Maino".

Mike Maino
 President

This letter is valid only on original IATAN letterhead along with a copy of the 1994 IATAN Personnel List and until June 24, 1994

Operations
 Suite 4060, 2000 Peel Street
 Montreal, Quebec, Canada H3A 2W5
 Tel. (514) 844 2877
 CABLE IATA NETWORK MONTREAL
 Fax (514) 844 2391

Marketing/Field Services
 300 Garden City Plaza
 Suite 342
 Garden City, New York 11530-3302
 Tel. (516) 747 4718
 Fax (516) 747 4462

Mailing Address
 P.O. Box 2988
 Pittsburgh,
 New York, 12901-0269

an IATA company
 A3248-2/03/B1



May 13, 1994

JIANHUA ZHANG
CHINA & ASIA TRAVEL SERVICE INC.
CHINA INTERNATIONAL TRAVELSERVICE HEADQUARTERS (U.S.A.)
975 EAST GREEN STREET
SUITE 101
PASADENA, CA 91106

IATA Code Number: 05-7 0997 0

TCIN Number: ZHAJ50050501

Dear Travel Agent:

We acknowledge receipt of your application or renewal order for the IATAN Travel Agent ID Card.

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Your card is the key to your recognition in the industry. Show it with pride each time you travel. Welcome to the program.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike S. Maino".

Mike Maino
President

This letter is valid only on original IATAN letterhead along with a copy of the 1994 IATAN Personnel List and until June 24, 1994

Operations
Suite 4060, 2000 Peel Street
Montreal, Quebec, Canada H3A 2W5
Tel. (514) 844 2677
CABLE IATA NETWORK MONTREAL
Fax (514) 844 2391

Marketing/Field Services
300 Garden City Plaza
Suite 342
Garden City, New York 11530-3302
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Fax (516) 747 4462

Mailing Address
P.O. Box 2988
Plattsburgh,
New York, 12901-0269

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A3248-2/03/91

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EXHIBIT I



Robert E. Whitley, CTC
President

January 18, 1999

Frank Li, President
CHINA INTL. TRAVEL SVCE.
 975 E. Green St.
 Suite 101
 Pasadena, CA 91106

Dear Mr. Li:

We are pleased to acknowledge receipt and approval of the application of CHINA INTL. TRAVEL SVCE. for Associate Membership in USTOA.

A Certificate of Associate Membership is enclosed, together with a *USTOA* logo. Instructions for the use of the logo are located right at the top of the sheet.

It is indeed a pleasure to welcome CHINA INTL. TRAVEL SVCE. to *USTOA*. We look forward to working with you to develop travel and preserve "Integrity in Tourism."

Sincerely,

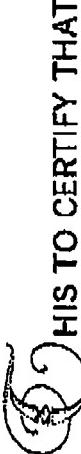
A handwritten signature in black ink, appearing to read "R E - L".

Robert E. Whitley
President

REW:sp
Enclosure

UNITED STATES TOUR OPERATORS ASSOCIATION

A NON-PROFIT CORPORATION



CHINA INTL. TRAVEL SVCE.

HIS TO CERTIFY THAT
has been elected and enrolled as an

ASSOCIATE MEMBER

of

UNITED STATES TOUR OPERATORS ASSOCIATION
established to promote and encourage professional,
financial and ethical integrity in tourismBy Authority of the Board of Directors, entered the 18th day of January, 1999
President

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

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EXHIBIT J

中華人民共和國駐美國洛杉磯總領事館

Consulate General of The People's Republic of China
501 Shatto Place, Suite 300 Los Angeles, CA 90020

Sir/Madam,

Effective May 1, 1993, this Consulate General will not accept application of visa, passport, authentication and notarization by mail. If the applicants are not able to come in person, they may apply through local travel service or law offices in Los Angeles, or through the Subsidiaries of China International Travel Service (CITS) or China Travel Service (CTS). Their addresses and phone Nos. are:

- 1) China & Asia Travel Service, Inc.
975 East Green St., Suite 101,
Pasadena, CA 91106
Tel: (818) 568-8993
(818) 568-8997 Fax: (818) 568-9207
- 2) U.S. China Travel Service, Inc.
119 S Atlantic Blvd., Suite 303,
Monterey Park, CA 91754
Tel: (818) 457-8668 Fax: (818) 457-8955

THANK YOU FOR YOUR COOPERATION. ANY FUTHER APPLICATION BY MAIL WILL NOT BE ACCEPTED & WILL BE RETURNED.

Visa Office

中華人民共和國駐美國洛杉磯總領事館

Consulate General of The People's Republic of China
501 Shatto Place, Suite 300 Los Angeles, CA 90020

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Visa Office